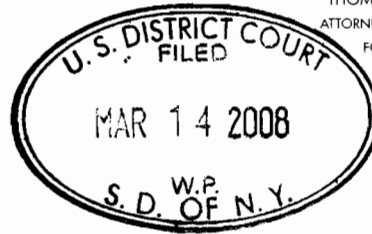




SUITE 300 LIBERTYVIEW 457 HADDONFIELD ROAD P.O. BOX 5459 CHERRY HILL, NJ 08002-2220
856.910.5000 800.989.0499 856.910.5075 FAX www.cozen.com

Jeffrey L. Nash
Direct Phone 856.910.5003
Direct Fax 877.259.7985
jnash@cozen.com

March 12, 2008



THOMAS MCKAY, III
ATTORNEY RESPONSIBLE
FOR NJ PRACTICE

The Hon. Mark D. Fox, USMJ
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

VIA FEDERAL EXPRESS

MEMO ENDORSED

Re: Valentine, et al.
v. MTD Products, et al.
07 CIV 3914
Our File No.: 186751

Dear Magistrate Fox:

I represent the plaintiffs in the above-referenced case. With the consent of all parties, I respectfully request a 60-day extension of time for plaintiffs to submit their experts' reports. Pursuant to our last conference, plaintiffs were to submit expert disclosure on or before March 13, 2008. Because of the complexity of this products liability action involving a lawn tractor, plaintiffs' experts need additional time to review discovery and to prepare a report. Therefore, I request that plaintiffs' expert disclosure now be due on or before May 13, 2008 with defendants' disclosure due on or before June 13, 2008 with supplemental reports due by plaintiffs on or before October 13, 2008 and defendants' supplemental expert disclosure supplied on or before October 31, 2008.

I greatly appreciate Your Honor's consideration and courtesies throughout.

Very truly yours,

COZEN O'CONNOR

Jeffrey L. Nash
BY: JEFFREY L. NASH

JLN/dcl

cc: Brian H. Mintz, Esquire via telecopy
Rosario M. Vignoli, Esquire via telecopy

3/14/08 APPLICATION GRANTED
So ORAL SET
MARK D. FOX
United States Magistrate Judge
Southern District of New York